

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP, D/B/A VERIZON
WIRELESS, and VERIZON CORPORATE
SERVICES GROUP INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

**DECLARATION OF MATTHEW AICHELE IN SUPPORT OF PLAINTIFF
HEADWATER RESEARCH LLC'S RESPONSE AND OPPOSITION TO
DEFENDANTS' MOTION TO COMPEL EXPERT REPORTS, TRANSCRIPTS,
EXHIBITS, WRITTEN DISCOVERY, AND ESI**

1. I, Matthew Aichele, declare as follows:

2. I am counsel for Headwater Research LLC (“Headwater”) in the above-captioned action. I provide this declaration in support of Headwater’s Opposition to Defendants’ Motion To Compel Expert Reports, Transcripts, Exhibits, Written Discovery, and ESI. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

3. Headwater produced the deposition transcript of Robert Lamb on December 27, 2024 with Bates-numbers HW352-00256110-HW352-00256221, HW379-00322321-HW379-0322432, and HW397-00095766-HW397-00095877.

4. As of January 2, 2025, Headwater has produced at least eighty-six documents in this case that hit on the term “InterDigital”. Those eighty-six documents total over 6,420 pages.

5. Attached as **Exhibit A** is a true and correct copy of an email thread between Defendants’ counsel and Headwater’s counsel, dated October 24, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025 in Bethesda, Maryland.

By: /s/ Matthew D. Aichele
Matthew D. Aichele